

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

GERALD LESAN,
Defendant.

NO. CR15-00387 JCC

GOVERNMENT'S RESPONSE TO
DEFENDANT'S MOTION TO REOPEN
DETENTION

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Matthew P. Hampton, Assistant United States Attorney for said district, files this Response to Defendant's Motion to Reopen Detention (Dkt. 20).

In its motion, the defense contends that an appropriate release address has been identified and approved by U.S. Pre-trial Services. Although the government lacks sufficient information to take a position on the ultimate question of release or detention at this time, the government does agree that Defendant has presented a significant change in circumstances within the meaning of the Court's earlier detention order that would justify a hearing on the question of Defendant's custody status pre-trial. The government

1 therefore suggests that this matter be set for a hearing at a time mutually convenient to
2 the parties and the Court's calendar.

3
4 DATED this 29th day of December, 2015.

5 Respectfully Submitted,
6 ANNETTE L. HAYES
7 United States Attorney
8

9 s/ Matthew P. Hampton

10 MATTHEW P. HAMPTON

11 Assistant United States Attorney

12 700 Stewart Street, Suite 5220

Seattle, WA 98101-1271

13 Telephone: 206-553-7970

14 Fax: 206-553-0755

E-mail: matthew.hampton@usdoj.gov
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2015, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s).

s/ Dru Mercer

DRU MERCER

Paralegal Specialist

United States Attorney's Office

700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271

Telephone: 206-553-7970

Fax: 206-553-2502

Email: dru.mercer@usdoj.gov